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JUL 27 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

)
Amendment of the Part 69)
Allocation of General Support)
Facility Costs)

CC Docket No. 92-222

BELL ATLANTIC'S¹ OPPOSITION TO MFS'S PETITION FOR RECONSIDERATION

The Commission should summarily deny MFS's petition.² MFS admits that it did not initially oppose the Commission's proposal to reallocate General Support Facilities ("GSF") costs.³ MFS now claims, however, that the reallocation of GSF costs somehow gives local exchange carriers ("LECs") an unfair competitive advantage. This claim is wrong, because this action simply corrects a previous misallocation of costs that no party previously opposed.

MFS's argument is incredible, however, given that MFS has been providing service unlawfully since its inception without a valid tariff;⁴ that MFS has no obligation to cost-justify any

¹ The Bell Atlantic telephone companies ("Bell Atlantic") are The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac telephone companies, The Diamond State Telephone Company and New Jersey Bell Telephone Company.

² MFS Communications Company, Inc. ("MFS"), Petition for Reconsideration ("Petition").

³ *Id.* at 1.

⁴ Provision of interstate common carrier service without a lawful tariff violates Section 203(c) of the Communications Act, 47 U.S.C. § 203(c).

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of its interstate rates; that MFS routinely charges

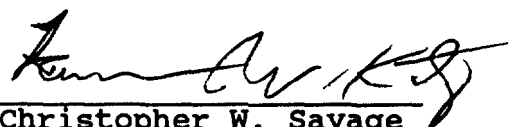
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The Commission should not countenance such an abuse of its regulatory processes, but should, instead, deny MFS's Petition.

Respectfully submitted,

**The Bell Atlantic Telephone
Companies**

By Their Attorneys



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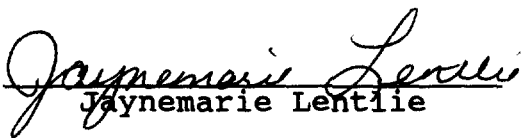
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July 27, 1993

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Bell Atlantic's Opposition to MFS's Petition for Reconsideration" was served this 27th day of July, 1993, by delivery thereof by first class mail, postage prepaid, to the parties on the attached list.


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